

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

THE PEOPLES GAS LIGHT AND
COKE COMPANY

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Petition Pursuant to Rider QIP
Of Schedule of Rates for Gas Service
To Initiate a Proceeding to Determine
The Accuracy and Prudence of
Qualifying Infrastructure Investment

Docket No. 15-0209

**VERIFIED PETITION TO INTERVENE OF
LOCAL 18007, UTILITY WORKERS OF AMERICA, AFL-CIO**

LOCAL 18007, UTILITY WORKERS OF AMERICA, AFL-CIO (“Local 18007”),
through one of its attorneys, hereby petitions the Illinois Commerce Commission (the
“Commission”) for permission to intervene in the above-captioned proceeding. In support of this
Petition, Local 18007 states as follows:

1. Local 18007 represents the employees of Petitioner Peoples Gas, Light & Coke Company (hereinafter “PGL&C”) who deliver natural gas to PGL&C’s residential and commercial customers and operate, maintain and repair the physical infrastructure necessary to provide this service.
2. Local 18007 members’ jobs, wages and working conditions will be directly and materially affected by the outcome of this proceeding.
3. The concerns of the workforce represented by Local 18007, particularly as to staffing levels, job security and workplace safety, have a direct bearing on decisions regarding Qualifying Infrastructure Investments at issue in this proceeding.
4. Local 18007 accepts service by electronic means as provided for in Section 200.1050 of the Commission’s Rules of Practice.

5. For purposes of the Service List, all documents should be served upon the following:

Ian Elfenbaum
Attorney for Local 18007
Elfenbaum Evers & Amarilio, P.C.
940 W. Adams Street, Suite 300
Chicago IL 60607
ianelf@ilcomplaw.com


Richard Passarelli
Business Manager
Utility Workers Local 18007
300 S. Ashland, Suite 206
Chicago IL 60607
richard.passarelli@gasworkers.org

Johanna Ryan, paralegal
Elfenbaum Evers & Amarilio
940 W. Adams Street, Suite 300
Chicago IL 60607
jryan@ilcomplaw.com

WHEREFORE, Local 18007, Utility Workers of America, AFL-CIO, respectfully petitions this Commission for leave to intervene in the above-captioned proceeding.

Dated: February 3, 2016

Respectfully submitted,



Ian Elfenbaum
Attorney for Local 18007

Elfenbaum Evers & Amarilio, P.C.
940 W. Adams Street, Suite 300
Chicago IL 60607
(312) 226-2650

STATE OF ILLINOIS)
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COUNTY OF COOK) SS:


VERIFICATION

I affirm that I have knowledge of the contents of this Petition, which are true and accurate to the best of my knowledge.



Ian Effenbaum
Attorney for Local 18007

Notarized this 3rd day of February, 2016



Notary Public

